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RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA
GROMADA IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S LETTER BRIEF REGARDING
PLAINTIFFS' SUBPOENA TO BALLARD
PARTNERS**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

DECLARATION OF VERONICA GROMADA
IN SUPPORT OF UBER'S LETTER BRIEF RE:
PLAINTIFFS' SUBPOENA TO BALLARD PARTNERS

Case No. 3:23-MD-3084-CRB

1 I, Veronica Gromada having personal knowledge of the following state:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for
3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am
4 a member in good standing of the Bar of the State of Texas and admitted *pro hac vice* in this litigation.
5 I know the following facts to be true of my own knowledge, except those matters stated to be based
6 on information and belief, and if called to testify, I could competently do so.

7 2. I respectfully submit this declaration in support of Uber’s Letter Brief opposing Plaintiffs’
8 Letter Brief to enforce their third party subpoena to Ballard Partners (ECF 1555).

9 3. On February 6, 2024, in *In re Uber Rideshare Cases*, Case No. CJC-21-005188 Judicial
10 Council Coordination Proceeding No. 5188 (hereinafter “Uber JCCP, No. 5188”), the Superior Court
11 of California issued an order concerning Plaintiffs’ Motion for Compelling Marketing and Lobbying
12 documents.

13 4. A true and correct copy of the Uber JCCP Court’s Order on Plaintiffs’ Motion for Order
14 Compelling Marketing & Lobbying Documents is attached hereto as **Exhibit A**.

15 5. On information and belief, Ballard Partners is a lobbying and public relations firm that
16 performed lobbying on behalf of Uber focusing on its status as a Transportation Network Company
17 (“TNC”) and issues regarding the “sharing economy,” foreign regulation of data management, and
18 technology policy and regulation.

19 6. True and correct redacted versions of Uber’s contracts with Ballard Partners dated October 27,
20 2014, January 1, 2015, and May 5, 2015, and a termination letter dated November 30, 2020 are
21 attached as **Exhibit B**. Uber’s agreements with Ballard Partners prohibit Ballard Partners from
22 disclosing to third parties Uber’s confidential or proprietary information, or using the information
23 except for the purposes of their engagement.

24 7. On information and belief, the communications and documents exchanged between Uber and
25 Ballard Partners are primarily related to Uber’s lobbying efforts and public policy strategies. These
26 communications include discussions on legislative priorities, regulatory strategies, and advocacy
27

1 plans, which are central to Uber’s federal affairs and lobbying activities. These communications were
2 intended to, and were, maintained as confidential.

3 8. On information and belief, disclosure of Uber’s non-public and confidential communications
4 and documents related to lobbying would chill internal discussions and discussions with Uber’s
5 lobbyists, including Ballard Partners. Effective lobbying and public policy efforts require room to
6 freely discuss strategies and priorities. Public disclosure of internal communications and documents
7 would likely result in much more limited communications, impeding Uber’s ability to effectively
8 petition the government.

9 9. To date, Uber has produced 5,143 documents with the terms “background check,” “background
10 checks,” “BGC,” or “BGCs” in this MDL and the Uber JCCP. This number does not include
11 documents produced pursuant to the Defendant Fact Sheet Process or for bellwether-specific
12 productions in the JCCP.

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14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on September 6, 2024.

By: /s/ Veronica Gromada

16 Veronica Gromada
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